

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

ALAN DERSHOWITZ,

Defendant.

Civil Action No. 19-cv-03377-LAP

**DECLARATION OF MICHELLE PROCTUS IN SUPPORT OF DEFENDANT
ALAN DERSHOWITZ'S MOTION TO DISMISS COMPLAINT**

I, Michelle Proctus, declare as follows:

1. I am a paralegal at Todd & Weld LLP, which represents Defendant Alan Dershowitz in this action and whose attorneys, Howard M. Cooper and Christian G. Kiely, have applied for admission *pro hac vice* to this Court. I respectfully submit this declaration in support of Prof. Dershowitz's Motion to Dismiss the Complaint filed by Plaintiff Virginia L. Giuffre.

2. Attached hereto as Exhibit A is a true and accurate copy of Jane Doe #3 and Jane Doe #4's Motion Pursuant to Rule 21 for Joinder in Action, filed by Plaintiff Virginia Giuffre in *Doe v. United States*, 9:08-cv-80736 (S.D. Fla.), on December 30, 2014.

3. Attached hereto as Exhibit B is a true and accurate copy of Motion for Limited Intervention by Alan M. Dershowitz, filed by Prof. Dershowitz in *Doe v. United States*, 9:08-cv-80736 (S.D. Fla.), on January 5, 2015.

4. Attached hereto as Exhibit C is a true and accurate copy of the Declaration of Virginia Giuffre, filed by Plaintiff Virginia Giuffre in *Doe v. United States*, 9:08-cv-80736 (S.D. Fla.), on January 21, 2015.

5. Attached hereto as Exhibit D is a true and accurate copy of Order Denying Petitioner's Motion to Join Under Rule 21 and Motion to Amend Under Rule 15, entered by the Court, Marra, J., in *Doe v. United States*, 9:08-cv-80736 (S.D. Fla.), on April 7, 2015.

6. Attached hereto as Exhibit E is a true and accurate copy of "Dershowitz: 'I'm an Innocent Victim of Extortion Conspiracy,'" *Wall Street Journal Law Blog*, Jan. 2, 2015.

7. Attached hereto as Exhibit F is a true and accurate copy of "Prince Andrew and Alan Dershowitz Are Mentioned in Suit Alleging Sex with Minor," *New York Times*, Jan. 3, 2015.

8. Attached hereto as Exhibit G is a compilation of true and accurate transcriptions of various television and radio appearances made by Alan Dershowitz in 2015.

9. Attached hereto as Exhibit H is a true and accurate copy of "Top US lawyer Dershowitz: can his accusers in sex case be disbarred?", *Reuters*, Jan. 6, 2015.

Signed under the pains and penalties of perjury this 19th day of June, 2019.

Michelle Proctus
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